

KTF:RMS
F. #2023R00353

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

TYSHAWN SIMMOND,

Defendant.

I N F O R M A T I O N

Cr. No. 23 - 333 (O E M)
(T. 18, U.S.C., §§ 924(d)(1),
981(a)(1)(C), 1951(a), 2 and 3551 et
seq.; T. 21, U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

----- X
THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE
(Hobbs Act Robbery Conspiracy)

1. In or about and between April 2023 and May 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant TYSHAWN SIMMOND, together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of money and goods from businesses located in Queens, New York.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT TWO
(Hobbs Act Robbery)

2. On or about May 2, 2023, within the Eastern District of New York and elsewhere, the defendant TYSHAWN SIMMOND, together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and

commodities in commerce, by robbery, to wit: the robbery of cash and an automated teller machine from a business located on Jamaica Avenue in Queens, New York.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon conviction of the offenses charged herein, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offenses; and (b) Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any violation of any other criminal law of the United States, including but not limited to the following assets seized on or about May 2, 2023, in Brooklyn, New York:

(a) One black Taurus 9mm semiautomatic pistol bearing serial number TIT05259, with one 9mm Luger cartridge contained therein;

(b) One black Taurus Millennium PT111 G2 magazine, with three 9mm Luger cartridges contained therein; and

(c) One automated teller machine, including its contents, taken from premises located on Jamaica Avenue in Queens, New York, and all proceeds traceable thereto.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence;

(b) has been transferred or sold to, or deposited with, a third party;

- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

By Whitman G.S. Knapp, Asst. U.S. Atty.
BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

CRIMINAL DIVISION

UNITED STATES OF AMERICA

vs.

TYSHAWN SIMMOND,

Defendant.

INFORMATION

(T. 18, U.S.C., §§ 924(d)(1), 981(a)(1)(C), 1951(a), 2 and 3551 et seq.; T. 21,
U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.

Foreperson

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Rebecca Schuman, Assistant U.S. Attorney (718) 254-7202

